

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS, *et al.*,)
Plaintiffs,)
v.)
UNITED STATES OF AMERICA, *et al.*)
Defendants.)

)

No. 1:14-CV-254

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' FILING**

Defendants hereby respectfully request an extension of seven days, until June 3, 2015, to respond to Plaintiffs' filing of May 20, 2015. *See* ECF No. 261. Undersigned conferred with counsel for Plaintiffs and Plaintiffs do not oppose this motion.

Pursuant to the schedule set forth in this Court's Order of April 7, 2015, *see* ECF No. 226, as amended, *see* ECF Nos. 235, 250, Plaintiffs filed their Response on May 20, 2015. *See* ECF No. 261. In this Response, Plaintiffs argue that Defendants' prior production includes broad assertions of privilege, *see id.* at 2-4, and that Plaintiffs have concerns about Defendants' ongoing compliance with the preliminary injunction. *See id.* at 6-8. Plaintiffs therefore mention a number of potential options and suggested courses of action to the Court. *Id.* at 9.

Defendants' deadline for responding to Plaintiffs' filing is currently May 27, 2015. *See* ECF No. 250. Plaintiffs' suggested options will require careful consideration and inter-agency consultation among the relevant agencies within DHS and their counsel

to formulate an appropriate response, which would be difficult to effectively accomplish during the four business days currently permitted for Defendants' response.

Accordingly, in order to effectively prepare an appropriate response to Plaintiffs' filing and to allow sufficient time for coordination with the relevant agencies within DHS, Defendants respectfully request, without opposition by Plaintiffs, that Defendants' deadline for responding be extended by seven additional days, until June 3, 2015.

Dated: May 21, 2015

Respectfully submitted,

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/s/ Daniel Schwei
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CERTIFICATE OF CONFERRAL

Pursuant to Local Civil Rule 7.1.D, undersigned counsel hereby certifies that counsel for Plaintiffs, Angela Colmenero, was contacted regarding Plaintiffs' position on the foregoing Motion for Extension of Time, and indicated that Plaintiffs do not oppose the relief sought in this Motion.

/s/ Daniel Schwei
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Unopposed Motion for Extension of Time to Respond to Plaintiffs' Filing has been delivered electronically on May 21, 2015, to counsel of record via the District's ECF system.

/s/ Daniel Schwei
Counsel for Defendants